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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Jason Crews,

Plaintiff,

v.

Symmetry Financial Group, LLC
and Brandon Ellison,

Defendants.

No. 2:25-cv-00376-CDB

DEFENDANTS' UNOPPOSED MOTION
FOR ADDITIONAL TIME TO RESPOND
TO COMPLAINT

(Second Request)

1 1. Under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 7.3,
2 Defendants Symmetry Financial Group, LLC and Brandon Ellison hereby move for
3 a brief extension of time—through May 21, 2025—to answer or otherwise respond
4 to Plaintiff’s Complaint. For the reasons described below, good cause exists to grant
5 this extension.

6 2. Defendants’ current responsive pleading deadline is April 30, 2025
7 per an extension. ECF No. 15.

8 3. Defendants and Plaintiff are voluntarily sharing information to either
9 simplify issues (*e.g.*, by eliminating non-viable claims) or resolve this case early.
10 Defendants therefore ask the Court for additional time to respond to the Complaint,
11 including so they can avoid motion practice and focus efforts on resolution.

12 4. The above constitutes good cause to grant this extension. It also
13 confirms that Defendants bring this motion in good faith and not for purposes of
14 delay.

15 5. Rule 6(b) of the Federal Rules of Civil Procedure vests this Court with
16 the discretion to grant this extension. Fed. R. Civ. P. 6(b); *see also Ahanchian v.*
17 *Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010) (Rule 6 is “a non-rigorous
18 standard” and a request for extension should “be granted in the absence of bad faith
19 on the part of the party seeking relief or prejudice to the adverse party.”).

20 6. This is Defendants’ second request for an extension and no prejudice
21 will result from granting it. The Court has not entered a scheduling order yet, so no
22 other upcoming deadlines will be impacted by the extension.

23 7. Nor will the extension prejudice Plaintiff, who consents to the relief
24 requested in full.

25 8. A proposed order is filed concurrently with this motion in accordance
26 with Rule 7.1(b)(3).
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1 Defendants accordingly request that the Court grant this motion and allow
2 them until May 21, 2025, to answer, move, or otherwise respond to the Complaint.

3
4 DATED: April 28, 2025.

Respectfully submitted,

5
6 /s/ Matthew A. Keilson

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10 * *pro hac vice* applications
11 forthcoming

12 *Attorneys for Defendants*
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CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2025, I caused a true and correct copy of the foregoing document to be served via the Court's electronic case management and filing system upon all counsel of record.

/s/ Matthew A. Keilson
Matthew A. Keilson